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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

KENNETH DIONE WARD,

Plaintiff,

vs.

KILOLO KIJAKAZI,
Acting Commissioner of Social Security,

Defendant.

Case No.: 2-22-cv-02001-APG-DJA

**UNOPPOSED MOTION FOR EXTENSION OF
TIME TO FILE CERTIFIED
ADMINISTRATIVE RECORD AND ANSWER;
~~PROPOSED~~ ORDER**

(FIRST REQUEST)

1 Defendant, Kilolo Kijakazi, Commissioner of Social Security (the “Commissioner”), by and
2 through the undersigned attorneys, hereby moves for a sixty-day extension of time to file the Certified
3 Administrative Record (CAR) and answer to Plaintiff’s Complaint. The CAR and answer to Plaintiff’s
4 Complaint are due to be filed by February 27, 2023.

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6 The certified administrative record (CAR) in this case has not been finalized for filing. The
7 agency’s Office of Appellate Operations (OAO) is responsible for preparation of CARs. Counsel for the
8 Commissioner is in contact with OAO to ensure that the CAR is properly certified for filing. Despite
9 diligent efforts OAO has indicated it still needs additional time to prepare the CAR. OAO has recently
10 been dealing with some staff shortages, changes in their processes and a surge of new filings which has
11 led to some delays in production of CARs. Counsel for the Commissioner has consulted with Plaintiff’s
12 counsel who advised that he has no objections to an extension of sixty-days.

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14 This request is made in good faith and is not intended to delay the proceedings in this matter. It is
15 therefore respectfully requested that Defendant be granted an extension of time to file the CAR and
16 answer to Plaintiff’s Complaint, through and including April 28, 2023.

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18 Dated: February 22, 2023

Respectfully submitted,

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20 JASON M. FRIERSON
United States Attorney

21 /s/ Oscar Gonzalez de Llano
22 Oscar Gonzalez de Llano
23 Special Assistant United States Attorney
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CERTIFICATE OF SERVICE

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 160 Spear Street, Suite 800, San Francisco, California 94105. I am not a party to the above-entitled action. On the date set forth below, I caused service of **UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE CERTIFIED ADMINISTRATIVE RECORD AND ANSWER; [PROPOSED] ORDER** on the following parties by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which provides electronic notice of the filing:

Hal Taylor
2551 W. Lakeridge Shores
Reno, NV 89519
Email: haltaylorlawyer@gbis.com

I declare under penalty of perjury that the foregoing is true and correct.

Dated: February 22, 2023

/s/ Oscar Gonzalez de Llano
Oscar Gonzalez de Llano
Special Assistant United States Attorney

JASON M. FRIERSON
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Attorneys for Defendant

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~~PROPOSED~~ ORDER GRANTING
EXTENSION OF TIME

1 Based upon Defendant's Motion for Extension of Time to File Certified Administrative Record and
2 Answer, and for good cause shown, **IT IS ORDERED** that the date on which Defendant's answer is due
3 is extended by thirty days, from February 27, 2023 to April 28, 2023. Defendant shall file the answer on
4 or before April 28, 2023. If Defendant is unable to produce the certified administrative record necessary
5 to file an answer in accordance with this Order, Defendant shall request an additional extension prior to the
6 due date.

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9 IT IS SO ORDERED:

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11 _____
12 UNITED STATES MAGISTRATE JUDGE

13 DATED: February 23, 2023
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